

**UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	CHAPTER 11
LITTLE WASHINGTON FABRICATORS, INC.,	:	BANKRUPTCY NO. 22-10695(PMM)
DEBTOR.	:	
	:	

**AFFIDAVIT OF DOUGLAS HOWE IN SUPPORT OF MOTION OF LITTLE
WASHINGTON FABRICATORS, INC. AUTHORIZING DOUGLAS HOWE TO MAKE
A LOAN TO THE DEBTOR AS AN UNSECURED ADMINISTRATIVE CLAIM**

I, Douglas Howe, being duly sworn according to law, hereby deposes and states as follows:

1. I am the President of Little Washington Fabricators, Inc. (the "Debtor").
2. On March 22, 2022 (the "Petition Date"), the Debtor filed a voluntary petition pursuant to chapter 11 of title 11 of the United States Code, as amended (the "Bankruptcy Code").
3. The Debtor is a large metal fabricator which provides miscellaneous and structural steel for construction projects. The Debtor opened in 2012 in Gordonville, Pennsylvania with a small shop, four (4) employees and one truck. Today, the Debtor leases a 32,000 square foot shop in Christiana, Pennsylvania with a 3 acre yard where it now employs thirty (30) employees, has 8 trucks and sales over \$25 million.
4. As set forth in the Debtor's first day pleadings, as a result of the Covid-19 pandemic, the Debtor began experiencing severe price escalations to its supplies. As the Covid-19 pandemic continued, the Debtor continued to experience work stoppages on its jobs, new job site requirements that required additional costs and imposed restrictions, and supply issues that were unprecedented and unable to be accounted for by the Debtor. In addition, due to the crunch across the industry, many general contractors have been slow to pay the Debtor.
5. In order for the Debtor to successfully reorganize, the Debtor needs to push forward

on its contracts that it intends to assume. As such, the Debtor needs to purchase certain supplies/materials for its projects.

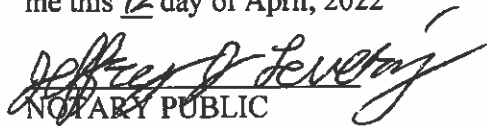
6. As set forth above, in the Motion the supplies/materials are needed in order for the Debtor to continue performing on certain contracts.

7. I am requesting administrative status for this loan under Section 364(b) of the Bankruptcy Code.

8. I acknowledge that I am subject to the penalties of perjury if I have willfully misrepresented any factual information in connection with this Affidavit.


Douglas Howe

Sworn to and Subscribed before
me this 12 day of April, 2022


NOTARY PUBLIC

